

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
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Secretary

Martin Suuberg
Commissioner

June 14, 2018

Alexandra Dunn, JD
Regional Administrator
US Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Re: PFAS Impacts to Ayer and Devens Public Water Supplies
Fort Devens Superfund Site, Massachusetts

Dear Administrator Dunn:

I am writing to you regarding the impacts on communities resulting from the presence of PFAS in the Devens and Ayer public water supplies from sources associated with the Fort Devens Superfund Site.

The results of sampling the Devens and Ayers public water supply wells indicate consistently elevated levels of per- and poly-fluorinated substances (PFAS), with combined concentrations of two specific compounds, PFOS and PFOA, close to or exceeding the USEPA Health Advisory of 70 ng/L. Several other structurally similar PFAS – which MassDEP believes exhibit similar toxicity – are present as well, resulting in concentrations of five PFAS of concern above the 70 ng/L criteria¹.

MassDevelopment (which operates the Devens PWS) and the Town of Ayer have taken immediate steps to modify the operation of their water systems and reduce the public's exposure to these contaminants. These actions include temporary measures, such as removing the most highly contaminated wells from service, blending, and returning to service less efficient wells. In addition, both systems are planning for longer-term solutions, such as the installation of treatment systems and the construction of emergency cross-connections.

¹ As you are aware, MassDEP is evaluating the contamination present in these public water supply wells based on the available toxicity information for PFAS and the risk assessment standards promulgated in 310 CMR 40.0000 and 301 CMR 22.00. Based on the available toxicological information, MassDEP is quantitatively addressing five PFAS chemicals, including PFOA, PFOS, perfluorononanoic acid (PFNA), perfluorohexanesulfonic acid (PFHxS) and perfluoroheptanoic acid (PFHpA). The Department has finalized a drinking water guideline ("ORSG") based on this approach and will promulgate MCP Method 1 Standards for PFAS in groundwater used as drinking water (category GW-1 groundwater) later this year.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

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Alexandra Dunn

June 14, 2018

Page 2

The Devens and Ayer water suppliers are acting in a timely, responsible and appropriate manner given their obligation to provide their citizen's with safe drinking water. These actions come at a cost, however – a cost that is being carried by the downgradient recipients of the contamination.

The US Army is conducting an investigation of PFAS contamination of the groundwater at and near the Fort Devens Superfund Site. This work is overseen by US EPA Region 1 staff with the participation of MassDEP Waste Site Cleanup staff in Boston. MassDEP appreciates the efforts the Army has taken to expedite the Remedial Investigation (RI), including the commitment to sample public and private water supply wells as part of the RI. However, the proposed work falls short of what the Devens, Ayer and the Commonwealth need and expect.

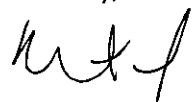
As a direct result of the PFAS contamination at Fort Devens, MassDevelopment and the Town of Ayer have had to close productive supply wells and plan for both the use of temporary alternative sources and longer-term treatment systems at substantial costs. The US Army should fund the costs associated with these response actions, including the planning and implementation of treatment of the PFAS-contaminated water.

Further, as a result of the PFAS contamination at Fort Devens, MassDevelopment and the Town of Ayer are subject to quarterly sampling of their public water supplies. The US Army should either conduct the required quarterly monitoring itself or bear the cost of this monitoring.

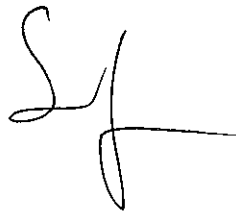
It is a basic premise of the Superfund Program that the Responsible Party bears the costs associated with the environmental contamination. Unfortunately, in the case of PFAS contamination at Fort Devens, the costs have been unfairly shifted to the public in the surrounding communities.

This is not a time to defer action pending additional study – the Town of Ayer and MassDevelopment took swift action to address water quality for thousands of citizens. I ask that you work with MassDEP, MassDevelopment and the Town of Ayer and support our efforts to have the Army take on a greater role in protecting the water supplies at Devens and Ayer.

Sincerely,



Martin Suuberg
Commissioner



cc: Lauren Liss, MassDevelopment
Jim Moore, MassDevelopment
Mark Wetzel, Town of Ayer